

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of: )

IMPROVING COMMISSION PROCESSES )

PP Docket No. 96-17

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**COMMENTS OF GTE**

GTE Service Corporation and its affiliated  
domestic telephone operating companies

Richard McKenna, HQE03J36  
GTE Service Corporation  
P.O. Box 152092  
Irving, TX 75015-2092  
(214) 718-6362

Gail L. Polivy  
1850 M Street, N.W.  
Suite 1200  
Washington, DC 20036  
(202) 463-5214

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Their Attorneys

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## SUMMARY

Among GTE's recommendations for reduced and streamlined regulation and improved processes are the following:

1. GTE urges the FCC to issue a final order -- based on the record created in response to the *Second Notice* and the implications of the 1996 Act -- to adopt streamlining of Parts 61 and 69 as soon as possible.
2. GTE suggests, pending Commission/Joint Board action eliminating the study area "freeze" and permitting a more dynamic approach to transactions that are consistent with Commission policy grounded in the directions of Congress, the Commission should implement procedures that will make unnecessary the issuance of scores of waivers in the course of a year.
3. In the words of Commissioner Chong, "it may be a worthy public interest goal to end depreciation prescriptions at the FCC as we close out the twentieth century." GTE urges the FCC to move promptly in the spirit of the 1996 Act to eliminate depreciation prescriptions for price cap carriers.
4. GTE suggests replacing very burdensome ONA-related reporting with the following filed on an annual basis: (i) ONA Services User Guide Diskettes (or only available on Internet for file; transfer versus filing with Commission); (ii) Disposition of new ONA Service Requests from ESPs (includes new ONA services available through SS7, ISDN, and IN); (iii) Information on SS7, ISDN, and IN projected deployment (unless terminated by the Commission); (iv) Affidavit attesting that GTE has not discriminated in the quality of installation and maintenance of ONA services to ESP competitors.

5. A more efficient and reliable means of providing and retrieving information would benefit both the Commission's staff as well as the industry it regulates. GTE encourages the Commission to begin defining an electronic system, similar to that used by other regulatory agencies -- such as the Securities and Exchange Commission. GTE looks forward to continuing to work with the FCC to see electronic filing procedures implemented as soon as possible.

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**COMMENTS OF GTE**

GTE Service Corporation and its domestic affiliated telephone operating companies ("GTE") submit these comments in response to the FCC's Notice of Inquiry, FCC 96-50 (released February 14, 1996), requesting suggestions for improving the Commission's processes.

**INTRODUCTION**

GTE commends the Commission's past and present efforts to improve its processes. Implementation of the Telecommunications Act of 1996 (the "1996 Act") will require the FCC to be creative about "redirecting" its existing resources to meet the aggressive agenda mandated by the statute. In this spirit, GTE here offers specific proposals for the elimination of unnecessary regulation of Local Exchange Carriers ("LECs" or "exchange carriers").

**I. THE FCC SHOULD STREAMLINE ITS CURRENT PROCESS FOR TARIFF FILINGS AND WAIVER REQUESTS.**

The FCC can take immediate action to streamline a number of processes related to the filing of interstate tariffs and requests for waivers of the Commission's access charge rules. Specifically, the FCC should (i) adopt many proposals set forth in the Second Further Notice of Proposed Rulemaking (*Second Notice*) in CC Docket No. 94-1 ("D.94-1") regarding changes to baseline price cap regulation, and (ii) enact the

streamlined regulatory requirements provided for under the 1996 Act, for the following reasons.

First, the FCC's existing Part 69 rules require exchange carriers to first seek a formal waiver of the rules in order to implement new rate elements for switched access services. This process seriously impairs a LEC's ability to introduce new services based on advanced technologies by building in substantial regulatory delays -- a fact recognized by the *Second Notice* at paragraph 69. The *Second Notice* proposes that LECs would not have to meet the usual standard for a waiver and would only have to show that the new service or rate element would serve the public interest. GTE's comments in D. 94-1 filed December 11, 1995 proposes an alternative procedure under which: (i) LECs would file a Notice of Intent describing the service and applicable rate elements; (ii) then, absent a finding that the introduction of the new switched service is not in the public interest, the waiver would be automatically granted.

This would avoid the cumbersome procedures that make LEC innovation so difficult today inasmuch as it would allow for implementation within a relatively short period (*i.e.*, ten days) without the need for issuance of a formal order. Given the immense responsibilities of the Commission and the statutory deadlines it faces, GTE submits that FCC procedures should be designed to avoid whenever possible the need for issuance of an order. Not only is this more practical; it returns FCC regulation to the original plan of the Communications Act of 1934, which emphasized carrier initiative as

the keystone of effective regulation.<sup>1</sup> Under these proposals, the Commission retains the power to safeguard the public interest where a problem arises, but the entire competitive parade is not frozen in place while an order is drafted and moved through the FCC's sign-off procedures -- and this occurring again and again. Exchange carriers, being held responsible for their actions, should be able to operate under streamlined procedures of this kind. GTE urges the FCC to streamline Part 69.

Second, the *Second Notice* also proposed to streamline the filing of new service tariffs and to shorten the period for the filing of rate restructures. Under these proposals, services that LECs are mandated to provide would be considered "Track 1" service subject to standard tariff filing and notice requirements. Other services would be deemed "Track 2" offerings, subject to shortened notice periods and reduced cost support requirements. Restructured services, that propose rate structure changes within the applicable pricing constraints of the price cap rules, would also be subject to shortened notice periods. These proposed changes to the Part 61 tariff filing rules would not only result in direct public benefits by encouraging the filing of new service tariffs, they would substantially reduce administrative costs for both the FCC staff and filing carriers.

Lastly, in the spirit of Section 402 and 403 of the 1996 Act -- which modifies 47 U.S.C. Sections 204(a) and 208(b) to specifically allow a LEC to "file with the Commission a new or revised charge, classification, regulation, or practice on a

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<sup>1</sup> See *Nader v. FCC*, 520 F.2d 182, 198 (D.C. Cir. 1975). See also 47 U.S.C. Section 157, which establishes a presumption in favor of new services and places the burden of proof on any party opposing a new service to demonstrate that the service is not in the public interest.



streamlined basis" -- *the Commission should* shorten notice requirements. The FCC has developed an ample public record in response to the *Second Notice* supporting proposals to adopt criteria that would qualify certain LEC services for streamlined regulation. GTE, among others, has proposed sensible criteria by which to identify those services. GTE's proposed definitions of the relevant market, as well as the competitive dimensions of its proposed addressability and demand responsiveness criteria, would be relatively simple for the FCC to review and administer. As GTE has shown, competition for LEC access services is already significant in a number of its markets; as mandated by the 1996 Act, competition will now become universal.

**In summary:** GTE urges the FCC to issue a final order -- based on the record created in response to the *Second Notice* and the implications of the 1996 Act -- to adopt streamlining of Parts 61 and 69 as soon as possible.

## **II. THE FCC SHOULD ELIMINATE ITS BURDENSOME PROCEDURES FOR STUDY AREA WAIVERS.**

In addressing the need to simplify its procedures so that companies that have reached agreement on the purchase and sale of property will no longer be delayed unnecessarily for months, the Commission should give careful weight to the mandate of Congress embodied in the 1996 Act, specifically Section 254(b), entitled *Universal Service Principles*, which says that the federal/state Joint Board and the Commission shall base policies for the preservation and advancement of universal service on certain identified principles, including the following:

- (3) **ACCESS IN RURAL AND HIGH COST AREAS** - Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are

available at rates that are reasonably comparable to rates charged for similar services in urban areas.

In light of the foregoing, GTE suggests the Commission should explicitly recognize that aggressive investment programs by exchange carriers seeking to furnish a high level of service in the areas they serve violate neither the letter nor the spirit of the congressional mandate. Indeed, a sound investment program of this character is exactly what Congress wishes.

The Commission should therefore simplify its procedures so study areas can be adjusted to reflect the purchase and sale of properties without undue delay and without the imposition of unreasonable and arbitrary conditions. GTE suggests the Commission should reexamine the approach proposed in 1990 in the Joint Board proceeding, CC Docket No. 80-286, *Amendment of Part 36*, Notice of Proposed Rulemaking, 5 FCC Rcd 5974 (1990), which would have largely obviated the need for burdensome waiver proceedings by shortening the pleading cycle, by employing sensible assumptions, and by permitting the transactions to proceed unless the Commission makes a contrary decision -- thus saving the FCC from having to issue scores of unnecessary and repetitive waiver decisions in the course of a year.

**In summary:** GTE suggests this approach should be adopted pending Commission/Joint Board action eliminating the study area "freeze" and permitting a more dynamic approach to transactions that are consistent with Commission policy grounded in the directions of Congress.

### **III. THE FCC SHOULD ELIMINATE DEPRECIATION PRESCRIPTIONS FOR PRICE CAP CARRIERS.**

The passage of congressional legislation reinforces GTE's position that FCC depreciation rate regulation is no longer needed in light of price cap implementation.

Continuation of the process of depreciation prescription for price cap carriers serves no useful purpose vis-a-vis the consumer or the industry. Section 403(d) of the 1996 Act, which makes it clear the FCC has the discretion to refrain from prescribing depreciation, suggests the Commission should promptly examine its rules so that LECs subject to price caps will have the freedom to set their own depreciation rates under generally accepted accounting standards in the same manner as the competition. Otherwise, certain carriers will be heavily burdened in a way not required or justified under the new legislation.

A number of states have already removed this burden by recognizing that commission imposed depreciation rates have no relevancy in today's communication market.<sup>2</sup> The "Information Super Highway" is not the place for an antiquated process begun over sixty years ago that adds cost without value. As recently as January 18, 1996, Commissioner Chong -- in the course of a most compelling argument with regard to the FCC's depreciation rate order for Alascom -- stated that the FCC "should no longer need to prescribe depreciation rates ... and it is my hope that in the relatively near future the rise of competition will enable us to end this resource-intensive regulatory activity...."

GTE notes that the FCC has scheduled for February of 1997 a Notice of Proposed Rulemaking ("NPRM") to examine the depreciation process. GTE believes that a delay of nearly twelve months in even issuing an NPRM would serve only to thwart the will of Congress. Twice this decade the FCC has held proceedings on

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<sup>2</sup> See Comments of USTA filed concurrently herewith.

simplifying the depreciation process, and twice this decade made only miniscule progress. If there is a need for another NPRM, its issuance should not be delayed.

In GTE's view, there is no need for another NPRM. The Commission has an ample record in CC Docket No. 92-296, where USTA's Petition for Reconsideration is still pending, to support the elimination of control over the depreciation rate setting process.

**In summary:** In the words of Commissioner Chong, "it may be a worthy public interest goal to end depreciation prescriptions at the FCC as we close out the twentieth century." GTE urges the FCC to move promptly in the spirit of the 1996 Act to eliminate depreciation prescriptions for price cap carriers.

#### **IV. THE COMMISSION SHOULD STREAMLINE ITS ONA-RELATED REPORTS.**

GTE makes the following recommendations regarding overly burdensome reporting requirements under the Commission's Open Network Architecture ("ONA") policy -- requirements that were applied to GTE in CC Docket 92-256.<sup>3</sup>

##### **1. The work of public forums has proved to be very useful.**

GTE commends the Commission for its continued interest in streamlining its filing processes and for its desire to eliminate unneeded reports; and also commends the FCC for its interest in the continued use of public forums and industry meetings to work out constructive solutions to industry issues and sensible reductions in the amount of regulation required by the Commission. One such industry forum established to address issues associated with ONA and the needs of Enhanced Service Providers

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<sup>3</sup> *Application of Open Network Architecture and Nondiscrimination Safeguards to GTE Corporation*, CC Docket No. 92-256 ("D.92-256"), Report and Order, 9 FCC Rcd 4922 (1994).

("ESPs") is the Information Industry Liaison Committee ("IILC") sponsored by The Alliance for Telecommunications Industry Solutions ("ATIS"). The activities of the IILC are monitored and sanctioned by the Commission. The passage of the 1996 Act makes even more timely and urgent the Commission's attention to eliminating unnecessary ONA-related regulations.<sup>4</sup>

**2. Many reports are no longer necessary.**

Most of the Annual, Semi-Annual, and Quarterly reports required by the Commission policy on ONA and related nondiscriminatory safeguards were to be used to (i) determine the deployment status of GTE's unbundled network services designed to meet the needs of ESPs and to (ii) ensure that GTE is not discriminating against its enhanced service competitors. Many of these reports are no longer necessary because of compliance with GTE's approved ONA Plan, and in addition, the progress of ONA would be better resolved in an industry forum such as the IILC.

The deployment for the majority of existing Basic Serving Arrangements ("BSAs"), Basic Service Elements ("BSEs") and Complementary Network Services ("CNSs") are at, or near, 100% in the major market areas where the limited demand for ONA services exists. Future changes in the current market area percentages will be still smaller because of lack of demand for the majority of ONA services from the ESP community and fewer switches in the network not being capable of providing ONA

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<sup>4</sup> GTE suggests that, in many areas, industry forums can be most helpful. For example, the Negotiated Rulemaking Committee established to develop Hearing Aid Compatibility ("HAC") recommendations for new rules (CC Docket 87-124) for wireline telephones in workplaces and hotels and motels proved to be very successful. Informal forums and workshops help condense information to more factual data, potentially reducing paperwork and eliminating the need for ex partes. GTE would encourage the FCC to use public forums whenever possible.

services. The publication of the ONA Services User Guide will continue to reflect the availability of all existing and new BSAs, BSEs, and CNSs and further reporting in this format should not be required. The Commission should consider the July 31, 1996 filing as the sunset for this report.

**3. If the Commission requires that any outstanding ONA service requests previously identified as technically infeasible be summarized and presented to the IILC, this will avoid the need for continued reporting on this point.**

The Commission should require that any outstanding ONA service requests that were previously identified as technically infeasible be summarized and presented to the IILC. If any of these outstanding requests are still of interest to the ESP community, then an ESP should introduce a service request issue at the IILC. This process will identify those ONA services that are still of interest to ESPs and will terminate the requirement to continue reporting to the Commission on the disposition of these previous requests. Also, GTE will continue to respond to ESP new service requests through the 120-day New Service Request process and GTE proposes to continue reporting annually on the disposition of these requests. The IILC and 120-day New Service Request processes are both available to the ESP community to care for both national and regional requests, respectively. The Commission should consider the July 31, 1996 filing as the sunset for this portion of the new ONA service request report.

**4. Industry forum procedures could be more efficient in furnishing information to all interested parties.**

Equivalent information in this report (on projected deployment of SS7, ISDN and IN) is also provided in other FCC annual reports (e.g., the ARMIS 4307 infrastructure report). GTE suggests replacement of this reporting by FCC instructions addressed to the exchange carriers to create an informational issue at the IILC to compare and

contrast all other report(s) information and provide their findings to the IILC. If this information is in another report and meets the needs of the ESPs and the Commission, then the Commission could terminate this reporting requirement.

Similarly, reporting on new ONA services available through SS7, ISDN, and IN could be sunset at July 31, 1996. GTE will continue to respond to ESP new service requests through the 120-day new service request process, and GTE proposes to continue reporting annually on the disposition of these requests. Some of the new services requested through the 120-day process will require these technologies for implementation and will thus be reflected in the new ONA service request disposition report.

Other reporting requirements can be dealt with most efficiently as part of the Report Card. Various progress reports are now required on the implementation of service-specific and long-term uniformity issues, billing information, and OSS services. GTE will provide its progress on the implementation of service-specific and long-term uniformity issues concurrently with the annual IILC Report Card provided by the BOCs at the IILC. This Report Card is included in the minutes of the IILC meeting at which the information is provided and is distributed to all subscribers of the ATIS generated document. The IILC will continue to require this Report Card for as long as it is of value to the ESP community. Again, the Commission should review the July 31, 1996 filing as the sunset for this report.

GTE currently provides six ONA services that provide ESPs with information that is useful for bill preparation and may be useful to ESPs in billing customers. The Commission has approved these services as adequately providing billing information to

ESPs and has decided that GTE is not required to provide billing and collection services to ESPs. Thus, the Commission should review the July 31, 1996 filing as the sunset for this report.

**5. The July 31, 1996 report should be regarded as sunset for other unnecessary reports.**

Reporting on progress in developing and implementing OSS services and ESP access to those services has matured. ESPs have not requested OSS capabilities for access services either via the IILC or via the 120-day new service request process. Several IILC issues, 003, 039 and 051, address ESP access to OSS in very complete detail. GTE provides the same form of access to its OSS for its enhanced services group as it does for unaffiliated ESPs and is in compliance with the Commission's OSS Order. If GTE receives a request for direct OSS access, the request will be treated and reported as a 120-day new ONA service request. The Commission should review the July 31, 1996 filing as the sunset for this report.

The same applies to the list of BSEs used in the provision of GTE's own enhanced services. The BSEs currently utilized by GTE's ESP have been reported and GTE will comply with the Comparably Efficient Interconnection ("CEI") requirements of the Commission. Any new ONA services desired by GTE's ESP will be processed as a 120-day new service request and, if deployed, will be tariffed and implemented under the CEI rules. Thus, under GTE's current ONA Order, there is no possibility for



discrimination in the use of BSEs in the provision of GTE's own enhanced services.

The Commission should view the July 31, 1996 filing as the sunset for this report.<sup>5</sup>

As for the semi-annual report covering the matrix of GTE ONA services and state and federal tariffs, inasmuch as actual tariff references for ONA services are contained within the ONA Services User Guide diskettes -- and these provide more detailed information and thus are more useful to ESPs wanting to know where the services are tariffed -- this matrix is unnecessary. The Commission should view the March 30, 1996 filing as the sunset for this report.

As to data regarding state and federal tariffs, since actual tariff references for ONA services are contained within the ONA Services User Guide diskettes, GTE proposes elimination of a paper copy of the same information.

Finally, the Commission should sunset at July 31, 1996 the quarterly reports comparing the timeliness of GTE's installation and maintenance of basic services for own enhanced services operations with that for all customers. The Commission found that GTE had shown that its installation and maintenance procedures and systems are designed to preclude it from quality-based discrimination on the basis of the identity of the customer.<sup>6</sup> GTE uses mechanized systems to assign equipment and facilities that do not take into account the identity of the customer ordering service. GTE handles requests on a first- come, first-served basis and due date intervals are the same for all

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<sup>5</sup> GTE has no objection to continued filing of its affidavit attesting that GTE has not discriminated in the quality of installation and maintenance of ONA services to ESP competitors.

<sup>6</sup> See D.92-256, Memorandum Opinion and Order, DA 95-1468 (released June 29, 1996), 1995 FCC LEXIS 4327, at paragraph 35.

customers requesting similar types and quantities of service. If GTE cannot resolve a maintenance problem through the use of mechanized systems while speaking with the customer, the customer is given a standard commitment interval that is based upon the type of trouble reported and the facilities and equipment involved. This report only confirms the Commission's previous conclusion and is unneeded. The Commission should consider the July 31, 1996 filing as the sunset for this report and should utilize the annual affidavit as affirmation that GTE's systems and procedures preclude discrimination in installation and maintenance based upon customer identity.

**6. Continued semi-annual preparation of the ONA Services User Guide makes unnecessary various separate reporting items, as discussed supra, but without having to furnish it in unnecessary hard-copy form.**

GTE recommends that the ONA Services User Guide continue to be prepared on a semi-annual basis and made available via the IILC and GTE's Information Industry Team. GTE further proposes that only a diskette copy of the ONA Services User Guide (published each January) be filed with the Commission along with its first semi-annual filing in March of each year; or alternatively, that the diskette information must be available on the Internet for file transfer by the Commission and interested ESPs. Because of the volume of paper involved for a hard copy of the diskette information, GTE proposes deleting the filing of a paper copy.

**In summary:** GTE proposes to file the following reports with the FCC on an annual basis: (i) ONA Services User Guide Diskettes (or only available on Internet for file; transfer versus filing with Commission); (ii) Disposition of new ONA Service Requests from ESPs (includes new ONA services available through SS7, ISDN, and IN); (iii) Information on SS7, ISDN, and IN projected deployment (unless terminated by

the Commission); (iv) Affidavit attesting that GTE has not discriminated in the quality of installation and maintenance of ONA services to ESP competitors.

**V. GTE RECOMMENDS ELIMINATION OF A NUMBER OF UNNECESSARY REPORTING REQUIREMENTS, AND THE STREAMLINING OF THE REMAINING REPORTS.**

In addition to the instant proceeding, the FCC's Common Carrier Bureau has initiated CC Docket No. 96-23 ("D.96-23"), entitled "Revision of Filing Requirements," where comments are solicited on a specific list of Bureau filing requirements. GTE here identifies additional Bureau reports that should be streamlined or eliminated:

(1) additional ARMIS reports, (2) Local Transport Restructure ("LTR") Reports, (3) Open Network Architecture ("ONA") Reports, and the (4) Radio License Qualification Reports (Form 430).

**1. Pending its ARMIS rulemaking, the FCC should modify its forms and rules to reflect the action of Congress reducing the reporting frequency of ARMIS reports.**

The 1996 Act<sup>7</sup> directs the Commission to reduce the ARMIS filing requirement from quarterly (in the case of 4301 and 43-05) or semi-annual (43-06) to annual. The FCC's announced implementation schedule calls for an NPRM in May 1996 addressing ARMIS reporting and an order issued in September 1996.

Pending these formal procedures, GTE suggests unnecessary activity for both reporting carriers and the Bureau staff can be avoided by immediate issuance of an order or RAO implementing the statutory change by eliminating now unnecessary and inappropriate 1996 quarterly filings. The Commission should issue prior to June 30,

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<sup>7</sup> In response to FCC requirements, GTE files annually with the Commission the equivalent of over 75,000 pages of material.

1996 an order that has retroactive effect back to the legislation date. This simple action would eliminate any requirements for 1996 quarterly filings in compliance with the statute.

In addition, since quarterly ARMIS reporting is to be eliminated, and the 43-01 and the 43-04 reports contain much the same data, these two reports should be streamlined and combined into a single report filed on an annual basis populated with only the required data.

**2. The FCC should eliminate the Local Transport Restructure Quarterly Tracking Report.**

A December 29, 1993 Common Carrier Bureau letter asked GTE and the Bell Operating Companies to provide certain LTR monitoring data. The purpose of this report was to ensure that the goals of the local transport restructuring in CC Docket 91-213 ("D.91-213") were being met. Specifically these goals were: (1) to encourage efficient use of the transport facilities by allowing pricing that reflects costs; (2) to adopt a rate structure conducive to full and fair interexchange competition; and (3) to avoid interference with the development of interstate access competition. These reports were to be filed for every quarter of 1994, thirty days after the end of each quarter, with the final report filed January 30, 1995.

These quarterly reports showed the effects between same quarter previous year (*e.g.*, 1Q94 to 1Q93) and previous quarter (*e.g.*, 2Q94 to 1Q94) for transport and total switched access revenues broken out between Large, Medium and Small Interexchange Carriers. Each report would compare revenues collected by carrier group in a pre-LTR quarter (1Q93, 2Q93, 3Q93 and 4Q93) to the respective post-LTR quarter (1Q94, 2Q94, 3Q94 and 4Q94). By permitting a comparison of pre- and post-

LTR revenue view between carrier groups, these reports were designed to allow the Commission to determine if LTR was working to the disadvantage of the smaller IXCs and in favor of the larger IXCs.<sup>8</sup>

In its Third Memorandum Opinion and Order on Reconsideration and Supplemental Notice of Proposed Rulemaking in D.91-213, FCC 94-325 (released December 22, 1994), the FCC stated (at paragraph 22), "The empirical data filed by the BOCs and GTE indicate that the impact of the [transport] rate restructure on small and medium IXCs as groups during the first three quarters of 1994 ... has been minor." But then, in Paragraph 32 of this same order, the Commission states that "continued monitoring of the effects of the interim transport rate structure would be in the public interest, and we delegate authority to the Chief, Common Carrier Bureau, to continue and refine the Bureau's monitoring program."

GTE suggests that continuation of this reporting is unnecessary and indeed pointless because

First, the original monitoring requirement was for one year to determine the impact of the pre- and post-LTR on the classes of IXCs (large, medium and small). Reports submitted for 1995 and subsequent years will not reflect the changes between pre- and post-LTR, but between LTR and LTR. Therefore, these reports no longer provide the information for which they were originally designed.

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<sup>8</sup> Certain adjustments for price changes and changes in demand were made to the revenue amounts to allow the comparison to reflect only the changes caused by implementing LTR.

Second, the Commission placed the burden of these reports on GTE and the BOCs without receiving authorization of the Office of Management and Budgets (OM&B).

Third, this issue aside, the original intent of the report -- a comparison of the impact of pre- and post-LTR on the classes of IXCs -- is no longer being served by the continuation of this report, and it should be eliminated.

**3. The Form 430 Common Carrier Radio License Qualification Report Should Be "Amendable."**

The FCC Form 430 ("Licensee Qualification Report") is filed annually by licensees for each radio service authorized. Each annual filing must include all changes of information required by FCC Form 430 that occurred during the preceding year. In those cases in which there has been no change in any of the required information, the applicant or licensee, in lieu of submitting a new form, may so notify the Commission by letter. However, in the case of a minor change, such as for a change in board membership, the Form 430 must be refilled in its entirety. For such minor changes, the applicant or licensee should be allowed to simply "amend" the information already on file. For this reason, the Form 430 should be amendable.

**VI. RECOMMENDATIONS TO IMPROVE THE EFFICIENCIES OF THE FCC'S ADMINISTRATIVE PROCESSES.**

GTE offers the following suggestions to improve the speed and quality of FCC services to the public. Suggestions include: (1) electronic filing, (2) master record locator database, (3) "clearing house" for discretionary or ad hoc FCC information requests, and (4) streamlined processes for expediting informal carrier complaints.

**1. The FCC should implement full electronic filing.**

One of the most significant areas the FCC should undertake to improve the speed and quality of its service to the public would be to implement a full electronic filing system. Nothing would go further to improve the use of both public and private resources more efficiently.

In April 1994, GTE submitted comments in response to a promising FCC proposal to establish a Federal Advisory Committee to assist the Common Carrier Bureau in the development and implementation of an electronic filing system, CC Docket No. 94-18. The FCC proposed to create an advisory committee to assist in the formulation of rules and procedures for the electronic filing of Bureau applications, formal complaints, various reports, petitions, tariff filings, and related pleadings and reports. The advisory committee would make recommendations to the Bureau regarding (1) designing the technical software necessary to receive, store and retrieve Bureau filings; (2) studying the feasibility of creating an on-line public access system to the database; and (3) analyzing and identifying the costs of implementing and maintaining such a system and the feasibility of recovering such costs through user fees or other means.

GTE believes this still remains an open proceeding, and urges the FCC to consolidate the past record in this matter into PP Docket No. 96-17. Rather than "recreate the wheel," GTE proposes the FCC extend the benefits of electronic filing and access beyond the Common Carrier Bureau, and allow electronic filing throughout the Commission to other Branches and Divisions as well as to all parties filing documents.

GTE still supports the creation of an advisory committee to address this proposal; but further suggests expanding the committee's deliberations to include the security, capacity, availability and reliability of electronic filing. The industries regulated by the Commission have an untapped wealth of ideas to support this process, and GTE would be more than happy to assist the FCC in this important endeavor. The advisory committee process will enable the FCC to take advantage of the experience and expertise of GTE and others in developing an electronic filing system.

There are innumerable advantages that would flow from an electronic filing process. Beyond the benefit to the FCC of being able to access filings electronically, electronic filing would eliminate the storage space requirements and other costs incurred by the FCC in receiving and storing paper filings and would enable the FCC to manage and organize filing more efficiently. In this way, remote filings would be made possible and companies would benefit by being able to make last minute changes to FCC documents prior to filing deadlines. An electronic filing system would also facilitate public access to documents. Remote access to FCC records would largely eliminate the costly and time-consuming process of obtaining paper copies of FCC records. Also, with the impending plans for the FCC's headquarters offices to move to a new location a considerable distance from companies and law firms currently clustered near the Commission's offices in Washington, electronic filing would help alleviate the real concerns these companies and firms face in making timely filings daily and retrieving FCC documents.

Electronic Filing should be available for those who have the capability, via the Internet or other means. Cost savings would be substantial. For example, FCC



reporting requirements for ARMIS currently requires submission of both diskettes and paper (hard) copies. GTE estimates that it currently prints approximately 300,000 pages of information in order to comply with quarterly and annual ARMIS filing requirements.

**In summary:** A more efficient and reliable means of providing and retrieving information would benefit both the Commission's staff as well as the industry it regulates. GTE encourages the Commission to begin defining an electronic system, similar to that used by other regulatory agencies -- such as the Securities and Exchange Commission ("SEC"). GTE looks forward to continuing to work with the FCC to see electronic filing procedures implemented as soon as possible.

## **2. GTE recommends a Master Record Locator Database.**

The FCC should consider maintaining a master record locator database where licensees could designate a main point of contact, change of address, phone number, or provide other related data for correspondence purposes. Because the Commission's records are not always kept current, mail delays can range anywhere from thirty to sixty days in receiving licenses, violation notices, and other inquiries. Another advantage in using a locator list would be in avoiding duplicate or mass mailings for carrier notifications. A good example of this was last year, when the Commission mailed FCC Notices to every single licensee on record for FCC Regulatory User Fees. GTE's headquarters location in Irving, Texas alone received 152 copies of this duplicate information. Also, this would produce significant postage savings.